

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

TRISH KINCAID, on behalf of herself)
and others similarly situated,)
)
Plaintiff,)
)
v.) No. 1:18-cv-00707-AT
)
COURIER EXPRESS/CHARLOTTE,)
INC., COURIER EXPRESS/RALEIGH,)
INC., COURIER EXPRESS FREIGHT,)
INC., COURIER EXPRESS US, INC.,)
and IDEXX PHARMACEUTICALS,)
LLC,)
)
Defendants.)
)

**PLAINTIFF'S UNOPPOSED MOTION FOR PRELIMINARY APPROVAL OF
ATTORNEYS' FEES AND REIMBURSEMENT OF COSTS AND EXPENSES**

For the reasons set forth in the accompanying Memorandum of Law in Support of Plaintiff's Unopposed Motion for Approval of Attorneys' Fees and Reimbursement of Costs and Expenses ("Unopposed Motion for Attorneys' Fees"), the Declaration of Gilda Adriana Hernandez in Support of Plaintiff's Unopposed Motions for Provisional Certification of the Settlement Class; Appointment of Plaintiff's Counsel as Class Counsel; Preliminary Approval of Class and Collective Action Settlement; Approval of Settlement Administrator; Approval of Attorneys' Fees and Reimbursement of Expenses, and Approval of Service Awards

(“Hernandez Decl.”), and consistent with the terms of the proposed Settlement Agreement, Plaintiff respectfully requests that the Court enter an Order:

- (1) Awarding Class Counsel attorneys’ fees in the amount equal to one-third of the Maximum Gross Settlement Amount (i.e., \$533,333.33), should the Court grant final approval to the proposed Settlement Agreement and the settlement becomes effective; and
- (2) Awarding Class Counsel reasonable litigation costs and expenses in the amount of \$13,972.29, should the Court grant final approval to the proposed Settlement Agreement and the settlement becomes effective.

Plaintiff’s Counsel have conferred with counsel for Defendants, and, consistent with the parties’ Settlement Agreement, which has been presented to the Court for preliminary approval, Defendants do not oppose the instant motion for settlement purposes only.

Respectfully submitted, this December 20, 2018.

/s/ Gilda Adriana Hernandez
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CERTIFICATE OF SERVICE

I hereby certify that on December 20, 2018, the foregoing **PLAINTIFF'S UNOPPOSED MOTION FOR APPROVAL OF ATTORNEYS' FEES AND REIMBURSEMENT OF EXPENSES** was served in accordance with the Federal Rules of Civil Procedure on the following:

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Respectfully submitted,

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